

JuanJose Martinez-Madera A 14-647-093 Detained at ICE-El Centro Detention Facility 1115 North Imperial Ave. El Centro, Ca. 92243-1739

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA

2000 FEB 27 PM 3:00

IN THE MATTER OF :

JUANJOSE MARTINEZ-MADERA, A 14-647-093
(Petitioner Plaintiff) (In Pro Se)

Vs.

MICHAEL CHERTOFF, Secretary of the Department of Homeland Security; **MICHAEL B. MUKASEY**, Attorney General; **JULIE L. MYERS**, Assistant Secretary, United States Board of Immigration and Customs Enforcement (BICE); **ROBIN BAKER**, Director, San Diego ICE-Field Office District Director; **ROBERT G. RILLAMAS**, Assistant ICE-Field Office Director- El Centro; **JOEL MATA**, Supervisor of Detention and Deportation Officers-El Centro Processing Center,

Defendants – Respondents

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
February 10, 2008

February 10, 2008

DEPUTY

Case No. 07 cv 2237 JLS (WMC)

NUNC PRO TUNC

PETITIONER'S: FEB 19 2008

MOTION FOR

EXTENSION OF TIME

Petitioner, JuanJose Martinez-Madera, humbly requests and moves this Court for an Extension of Time of 1 (one) month in the filing of his Traverse to the government's opposition to my Writ of Habeas Corpus Petition civil file case No. 07 cv 2237 JLS (WMc) for the following reasons:

1) I am Pro Se, 2) I am not a legal expert, 3) I am not a fast typist, 4) I am not a computer expert
5) Lack of adequate access to the law-library here and/or resources at these detention facilities associated with our legal efforts and struggles. At times, up to 740 detainees here must share only 5 computers (only 3 of those connected to a printer) and only 4 typewriters. There are times that we come to the law-library but cannot access neither a computer nor a typewriter. 6) Access time to the law-library is also very super-limited and very, very restricted, 7) These places are being run in an overly exaggerated, restrictive manner to the point that we cannot even have a pen to write with and they cancel our library access for any reason. 8) According to the Court's deadline schedule my Traverse is due on February 29, 2008. I received the very voluminous government's opposition to my Writ of Habeas Corpus and need to go through it carefully for a proper answer.

Due to the above reasons, petitioner respectfully requests and moves this Court that this Motion for Extension of Time be granted. Thank you!

Thank you!

Respectfully Submitted,

Juan Jose Martinez-Madera
JuanJose Martinez-Madera

Juan Jose Martinez-Madera

Petitioner (In Pro Se)

Petitioner's Signature

**PROOF OF SERVICE BY MAIL
BY PERSON IN U.S. BICE CUSTODY**
(Fed. R. Civ. P. 5; U.S.C. § 1746)

I, JuanJose Martinez-Madera A 14-647-093 Case No. 07CV2237 JLS (WMc) declare that:

I am a party to this action. I am being detained by BICE and am a resident in one of their detention facilities in the Imperial County in the State of California at the following Address:

ICE El Centro Processing Center
1115 North Imperial Avenue
El Centro, California 92243-1739

I also state that: On this day Tuesday February 10, 2008, I served by ~~Certified~~ ^{Regular} First-Class United States Mail a true copy of the following attached documents:¹

1. Motion for Extension of Time (see case No. above)
2. This Proof of Service by Mail . . . to the following addresses:

1. United States Southern District Court
Clerk's Office
880 Front Street, Suite 4290
San Diego, California 92101-8900
2. Ms. Raven M. Norris
Assistant U.S. Attorney
880 Front Street, Room 6293
San Diego, California 92101-8893
3. U.S. - BICE - District Counsel
2409 LA Brucherie Road
Imperial, California 92251
4. U.S. – Trial Unit Attorney – Unit/EL
1115 North Imperial Avenue
El Centro, California 92243-1739

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my ability, knowledge and skills.

Respectfully Submitted,

Petitioner (In Pro Se) A 14-647-093


JuanJose Martinez-Madera

Executed on this date: Tuesday February 10, 2008

12


Petitioner's Signature

¹ This Pro-Se filing is deemed filed upon delivery to detainment "prison" authorities. See Fed. R. App. 25 (a)(c). Houston v. Lack, 487 U.S. 266, 101 L. Ed. 245, 108, S. Ct. 2379 at 274, 275 (1988).